

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-11803-MLW

SHENIA DANCY-STEWART as  
Administratrix of the Estate of EVELINE  
BARROS-CEPEDA,  
Plaintiffs,

v.

THOMAS TAYLOR, Jr., and the CITY  
OF BOSTON,  
Defendants.

**DEFENDANT'S ASSENTED-TO MOTION FOR TWO BUSINESS DAY  
EXTENSION OF TIME TO FILE DEFENDANT THOMAS TAYLOR'S  
REPLY BRIEF TO PLAINTIFF'S OPPOSITION TO  
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Defendant Boston Police Officer Thomas Taylor ("Defendant"), hereby moves for a brief two (2) business day extension of time to file his Reply Brief to Plaintiff's Opposition to the Defendant's Motion for Summary Judgment. If the Defendant's Motion for Extension is allowed, the Defendant's Reply Brief would be filed on or before Friday, July 25, 2008. In support of the instant motion, the Defendant states as follows:

1. Counsel for the Plaintiff assents to this Motion for Extension of Time.
2. Counsel for the Defendant fully expected to complete the Defendant's Reply Brief by Wednesday, July 23, 2008, but Counsel's unexpected involvement in other matters and an unexpected absence from the office has resulted in the need for additional time to fully prepare the Defendant's Reply Brief.
3. Defendant's Counsel needs and requests a short two (2) business day extension to complete the Defendant's brief.
4. Allowing this motion will not prejudice any party to the action and permitting the Defendants an extension will further the interests of justice.

WHEREFORE, the Defendant respectfully requests that this Court grant the instant Assented-to motion for a two (2) day extension of time, or until Friday, July 25, 2008, to file Defendant's Reply Brief.

Respectfully submitted,  
DEFENDANT, THOMAS TAYLOR, JR.,

By his attorney:

/s/ Helen G. Litsas

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Helen G. Litsas #644848  
Special Assistant Corporation Counsel  
Hollett Building  
38 Main Street  
Saugus, MA 01906  
(781) 231-8090

Evan C. Ouellette, BBO # 655934  
Assistant Corporation Counsel  
City of Boston Law Department  
Room 615, City Hall  
Boston, MA 02201  
(617)635-4048

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)**

Pursuant to L.R. D. Mass. 7.1(A)(2), I hereby certify that on July 23, 2008, I communicated with Plaintiff's Attorney, Andrew Stockwell-Alpert, regarding the *Defendant's Motion for Extension* and he assented to this motion.

7/23/08                      /s/ Helen G. Litsas

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Date                              Helen G. Litsas

**CERTIFICATE OF SERVICE**

I, Helen Litsas, Counsel for Thomas Taylor, do hereby certify that on this day I filed a true copy of the attached documents via electronic filing and provided Plaintiff's counsel with a copy by facsimile and regular mail.

Dated: July 23, 2008

/s/ Helen G. Litsas  
Helen G. Litsas